

OIG

Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

Audit Report

Administrative Law
Judge/Public Alleged
Misconduct Complaints System

A-05-11-01131 | July 2013

MEMORANDUM

Date: July 9, 2013

Refer To:

To: The Commissioner

From: Inspector General

Subject: Administrative Law Judge/Public Alleged Misconduct Complaints System (A-05-11-01131)

The attached final report presents the results of our audit. Our objective was to determine whether the Office of Disability Adjudication and Review's Administrative Law Judge/Public Alleged Misconduct Complaints system was properly identifying and tracking all administrative law judge complaints to resolution. We also sought to determine whether the system was operating as intended.

If you wish to discuss the final report, please call me or have your staff contact Steven L. Schaeffer, Assistant Inspector General for Audit, at (410) 965-9700.



Patrick P. O'Carroll, Jr.

Attachment

Administrative Law Judge/Public Alleged Misconduct Complaints System A-05-11-01131



July 2013

Office of Audit Report Summary

Objectives

To determine whether the Office of Disability Adjudication and Review's (ODAR) Administrative Law Judge/Public Alleged Misconduct Complaints (ALJ/PAMC) system was properly identifying and tracking all ALJ complaints to resolution. We also sought to determine whether the system was operating as intended.

Background

Claimants and their advocates or representatives may file a complaint against an ALJ if they believe the ALJ was biased or engaged in improper conduct. ODAR's Division of Quality Service (DQS) reviews and resolves these complaints with the assistance of ODAR's regional office (RO) staff, as appropriate. In February 2010, SSA announced it was establishing a new system of records to track ALJ complaints. According to the public notice, SSA designed the new ALJ/PAMC system to provide the Agency with information to (1) manage and respond to complaints; (2) process, review, or investigate complaints; (3) identify the parties to the complaint, including the names of the claimants and the ALJs who allegedly committed misconduct; and (4) document, monitor, and track ALJ complaints to identify patterns of improper behavior requiring further action.

Our Findings

DQS closed 1,490 ALJ misconduct complaint cases in Fiscal Year (FY) 2011. Using the information in the ALJ/PAMC system, we determined the overall ODAR median processing time for complaints was about 894 days, and DQS median processing time was about 400 days. Moreover, the ALJ/PAMC system did not have sufficient milestones to identify processing delays, though DQS started developing such milestones during our review.

Of the complaints closed in FY 2011, DQS substantiated about 4 percent of the cases. DQS closed approximately 11 percent of the cases because the ALJ left SSA before DQS completed a full review of the complaint. About 5 percent of the decision fields was left blank in the system. DQS determined the remaining 80 percent of the cases was unsubstantiated.

We also found the ALJ/PAMC system was not capturing key data to assist Agency managers responsible for addressing ALJ complaints and improving customer service. In addition, the Agency could improve outreach to the public to ensure the public was aware of all the options for filing a complaint against an ALJ to identify improper behavior, including racial discrimination. We also could not determine the reliability of the ALJ/PAMC system because DQS did not have documentation to support some of the data, initial data input was not uniform, and some key data fields were left blank. Finally, at the time of our review, DQS was not sharing ALJ/PAMC system management information with internal or external parties, though DQS was planning to share more information with the ROs as well as grant them access to the system.

Our Recommendations

We made a number of recommendations related to written procedures, system modifications, public notices, management information, and data quality issues.

SSA agreed with all of our recommendations.

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ABBREVIATIONS

AC	Appeals Council
ALJ/PAMC	Administrative Law Judge/Public Alleged Misconduct Complaints
CPMS	Case Processing and Management System
DQS	Division of Quality Service
Fed. Reg.	Federal Register
FY	Fiscal Year
GAO	Government Accountability Office
MI	Management Information
OAO	Office of Appellate Operations
ODAR	Office of Disability Adjudication and Review
OGC	Office of the General Counsel
OIG	Office of the Inspector General
POMS	Program Operations Manual System
RO	Regional Office
SSA	Social Security Administration
SSR	Social Security Ruling

OBJECTIVES

Our objective was to determine whether the Office of Disability Adjudication and Review's (ODAR) Administrative Law Judge/Public Alleged Misconduct Complaints (ALJ/PAMC) system was properly identifying and tracking all ALJ complaints to resolution. We also sought to determine whether the system was operating as intended.

BACKGROUND

Claimants and their advocates or representatives may file a complaint against an ALJ if they believe the ALJ was biased or engaged in improper conduct.¹ Individuals may submit written complaints to the Office of the Chief ALJ as well as regional offices (RO) and hearing offices. ODAR receives complaints through a variety of other means, including the Appeals Council (AC), the Social Security Administration's (SSA) National 800-Telephone Number Network, the Office of the Inspector General's (OIG) Hotline, and members of Congress on behalf of their constituents. According to SSA policy, ODAR will review, investigate, and respond to each public complaint against an ALJ.² The Division of Quality Service (DQS),³ within ODAR's Office of Executive Operations and Human Resources, reviews and resolves these complaints with the assistance of ODAR's RO staff, as appropriate. At the time of our review, DQS had assigned approximately 12 employees, including 2 branch chiefs and permanent and detailed staff, to handle ALJ complaints.⁴

In February 2010, SSA announced it was establishing a new system of records to track ALJ complaints.⁵ According to the public notice, SSA designed the new ALJ/PAMC system to provide the Agency with information to (1) manage and respond to complaints; (2) process, review, or investigate complaints; (3) identify the parties to the complaint, including the names of the claimants and ALJs who allegedly committed misconduct; and (4) document, monitor, and track ALJ complaints to identify patterns of improper behavior requiring further action.

¹ See Appendix A for a flowchart of the ALJ complaint process.

² Notice of Procedures: *Social Security Administration Procedures Concerning Allegations of Bias or Misconduct by Administrative Law Judges*, 57 Fed. Reg. 49186 (October 30, 1992). SSA was in the process of updating these procedures to clarify the roles of SSA, the AC, and the Office of the General Counsel (related to civil rights issues) at the time of our review consistent with a February 2013 Social Security Ruling (SSR). See SSA, SSR 13-1p: *Titles II and XVI: Agency Processes For Addressing Allegations of Unfairness, Prejudice, Partiality, Bias, Misconduct, or Discrimination by Administrative Law Judges (ALJs)* (Effective February 28, 2013); 78 Fed. Reg. 6168 (January 29, 2013); and *Corrections* 78 Fed. Reg. 9987 (February 12, 2013) and 78 Fed. Reg. 22361 (April 15, 2013).

³ In addition to processing ALJ complaints, DQS is responsible for employee and labor relations issues.

⁴ DQS management stated that the employees handling ALJ complaints spent no more than 50 percent of their work time on this workload. In addition, approximately 32 RO employees assist with processing the ALJ complaints.

⁵ *Administrative Law Judge/Public Alleged Misconduct Complaints System*, 75 Fed. Reg. 8171 (February 23, 2010).

Our October 2008 report on customer service issues at the Dover hearing office⁶ noted that ODAR did not have an automated database to track and produce management information on relevant trends, such as repeated bias complaints associated with an ALJ. The report also stated that information regarding the complaint process was inaccurate and not always publicized in hearing offices.⁷ In addition, an earlier report from the Government Accountability Office (GAO) on SSA's identification of complaints of racial bias against ALJs⁸ stated that, while the ALJ complaint process provided a mechanism for claimants to allege discrimination, it lacked useful mechanisms for detecting patterns of possible racial discrimination. Our current review sought to determine whether the new ALJ/PAMC system addressed these and other concerns. See Appendix B for our scope and methodology.

RESULTS OF REVIEW

DQS closed 1,490 ALJ misconduct complaint cases in Fiscal Year (FY) 2011. Using the information in the ALJ/PAMC system, we determined the median times for various processing timeframes in FY 2011.

- The overall ODAR processing time, from the ALJ hearing to the closing of the complaint, was about 894 days since the AC needed to process the majority of the cases before DQS could initiate its own review.
- DQS processing time was about 400 days.
- RO processing time, a subset of DQS processing time, was about 201 days.

We also found wide variances in the time ROs spent investigating complaints, but incomplete dates in the ALJ/PAMC system made it difficult to determine the full extent of this disparity. Moreover, the ALJ/PAMC system did not have sufficient milestones to identify processing delays, though DQS started developing such milestones during our review.

Of the complaints closed in FY 2011, DQS substantiated 4 percent. DQS closed approximately 11 percent of the cases because the ALJ left SSA before DQS completed a full review of the complaint. About 5 percent of the decision fields was left blank in the system. DQS determined the remaining 80 percent of the cases were unsubstantiated.

We also found the ALJ/PAMC system was not capturing key data to assist Agency managers responsible for addressing ALJ complaints and improving customer service. In addition, the Agency could improve outreach to the public to ensure the public was aware of all the options

⁶ SSA OIG, *Customer Service Issues at the Dover Hearing Office* (A-12-08-28080), October 2008, p. 14.

⁷ Id.

⁸ GAO, *SSA Disability Decision Making: Additional Measures Would Enhance Agency's Ability to Determine Whether Racial Bias Exists* (GAO-02-831), September 2002, pp. 17-18.

for filing a complaint against an ALJ to identify improper behavior, including racial discrimination. We also could not determine the reliability of the ALJ/PAMC system because DQS did not have documentation to support some of the data, initial data input was not uniform, and some key data fields were left blank. Finally, at the time of our review, DQS was not sharing ALJ/PAMC system management information (MI) with internal or external parties, though DQS was planning to share more information with the ROs as well as grant them access to the system.

ALJ Complaint Processing Trends

We analyzed cases DQS closed in FY 2011⁹ to understand the workload for that year.¹⁰ The ALJ/PAMC system indicated 1,390 pending ALJ complaints at the start of FY 2011. During FY 2011, DQS received an additional 1,189 ALJ complaints and closed 1,490 ALJ complaints,¹¹ leaving DQS with a pending workload of 1,089 ALJ complaints at the end of the FY (see Table 1).¹²

Table 1: FY 2011 DQS Workload in the ALJ/PAMC System

Complaint Status	Number of ALJ Complaints
Beginning Balance	1,390
Receipts	1,189
Closed	1,490
Ending Balance	1,089

Complaints Per ALJ

We reviewed the ALJs associated with the FY 2011 complaints maintained in the ALJ/PAMC system and identified 594 different ALJs associated with the 1,490 closed complaints.¹³ These

⁹ FY 2011 was the latest full FY in the ALJ/PAMC system at the time of our review. We obtained the ALJ/PAMC data as of April 20, 2012.

¹⁰ Later in the report, we discuss data quality issues that affect the information provided in this section. We also note the data issues in this section, as appropriate.

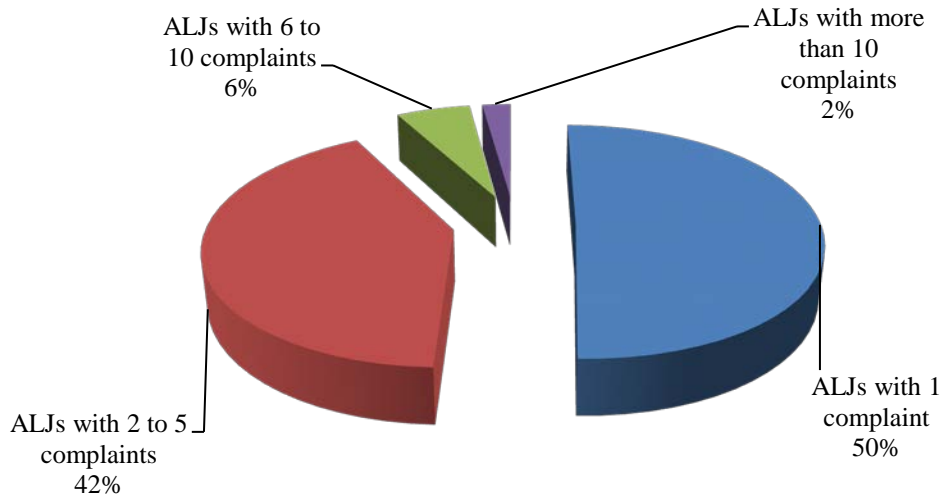
¹¹ To “close” a case, DQS has generally made a determination about the merits of the complaint and recommended the appropriate management response, if any. In other cases, DQS will close a case without determining its merits if the ALJ is no longer with the Agency.

¹² DQS processed incoming complaints using a first-in/first-out method, though it makes exceptions for critical cases, such as dire need situations.

¹³ Approximately 1,500 ALJs decided cases in FY 2011. While a complaint may be closed in FY 2011, it could relate to a different period.

594 ALJs had between 1 and 33 closed complaints (see Figure 1). Thirteen ALJs (2 percent) had more than 10 complaints among those closed in FY 2011.¹⁴

Figure 1: Number of Complaints Per ALJ Among 594 ALJs (FY 2011 Closed Cases)



Timeliness of Complaint Processing

We reviewed the time it took ODAR to process the 1,490 closed complaints in FY 2011 using the available dates in the ALJ/PAMC system and calculated the following.¹⁵

- The median time for ODAR to process a complaint, from the date of the ALJ hearing¹⁶ to the date DQS closed the case, was 894 days, since the AC processed the majority of the cases before DQS could initiate its own review. If the complaint is part of an AC appeal, the complaint will be processed after the AC refers the complaint to DQS.¹⁷

¹⁴ We provide additional details about three of the ALJs in Appendix C.

¹⁵ See Appendix D for more information on our timeliness calculations.

¹⁶ We used the date of initial hearing with the ALJ to determine the approximate date the complaint was filed since the ALJ/PAMC system did not always record the first date SSA received the complaint. We note this issue later in the report. Using the hearing date will add additional days to the processing time since the complaint would generally be filed sometime after the hearing.

¹⁷ In FY 2012, the average processing time for an appealed case was 395 days. We are conducting a separate audit of appeals processing at the AC. In addition, the AC may identify ALJ conduct that it determines warrants referral to DQS even if a claimant has not alleged it or filed a request for review with the AC.

- The median time for DQS to process a complaint, from the date DQS received the case to the date it closed the case, was 400 days.¹⁸
- The median time for an RO to investigate a complaint, from the date DQS referred the complaint to the RO to the date the RO shared its findings, was 201 days, with regional median processing times ranging from 55 to 461 days.

The DQS manager added that the variance in RO processing time might relate to the size of the region and the number of staff available to work the investigations.¹⁹ We excluded approximately 57 percent of the RO cases from our RO median time calculation because key processing dates were missing.²⁰ When we asked about the lack of RO processing dates in the system, a DQS manager explained that these missing dates might have related to high employee turnover in DQS. In FY 2011, DQS employed detailees for short periods of approximately 4 months to assist with the complaint workload.²¹

Timeframes for Reviewing Cases

During our audit, DQS was in the process of establishing timeframes for reviewing and resolving ALJ complaint cases. SSA established the DQS process to ensure “Every complaint will be reviewed or investigated in a timely manner by an official who was not involved in the alleged improper conduct.”²² The ALJ/PAMC system, as the primary system for monitoring these complaints, should identify delays in the process and notify appropriate managers. At the start of our review, DQS management told us the Agency had not established timeframes for reviewing and resolving complaints at every stage. However, during our review period, a DQS manager told us her office created its first report showing the age of pending complaints for internal use by DQS managers. In addition, this manager explained that DQS started tracking cases that were 1-year-old or older from the time DQS received them. DQS established a goal to close 60 percent of the year-old cases by the end of FY 2013.

¹⁸ DQS management noted that the component had additional temporary staff addressing a backlog of older cases that may have led to cases showing a longer median processing time. DQS management stated the ALJ/PAMC data shows median processing time in FY 2012 to be about 278 days.

¹⁹ When we contacted RO managers, we learned the ROs had assigned from two to five individuals to process and investigate ALJ public complaints.

²⁰ It is possible the RO statistics would be different if the processing dates were available for all cases. See Appendix D for more on these calculations.

²¹ In commenting on our preliminary findings, DQS management stated the component hired a staff member who will focus on ALJ/PAMC data quality and reporting of information to the ROs. See Appendix D for more on RO processing.

²² Notice of Procedures: *Social Security Administration Procedures Concerning Allegations of Bias or Misconduct by Administrative Law Judges*, 57 Fed. Reg. 49186 (October 30, 1992).

DQS also formalized a similar policy on the appropriate length of time for an RO to process a complaint case. Under the new policy, the ROs have 90 days from the date DQS requests further investigation to provide it with an investigative report with finding(s) and recommendation(s). To improve monitoring of RO timeliness, DQS will need to ensure the RO-related dates are being input before the ALJ/PAMC system can be a reliable tool for identifying RO case delays. As we noted earlier, some key data elements were missing from the system related to the regional transactions, such as the date the ROs sent recommendations to DQS, thereby reducing the usefulness of any new monitoring and alerts related to regional performance.²³

Since we initiated our review, DQS updated the ALJ/PAMC system to require that certain key data be recorded before a case can be closed, though the system does not require the missing RO processing dates. DQS noted it could not make this field mandatory since only a portion of cases were sent to the ROs for investigation. In addition, DQS informed us it was providing the ROs with aged case reports and was planning to allow them access to the ALJ/PAMC system, which should assist the ROs in managing this workload and potentially resolve the data integrity issues. Again, the success of DQS' monitoring is dependent on the quality of the underlying data.

Outcomes of Complaint Processing

For FY 2011 closed complaint outcomes maintained in the ALJ/PAMC system, DQS substantiated²⁴ 66 (4.4 percent) of the complaints associated with 43 different ALJs (see Figure 2).²⁵ In all these cases, management counseled the ALJs, and in one case, management administered a reprimand.²⁶

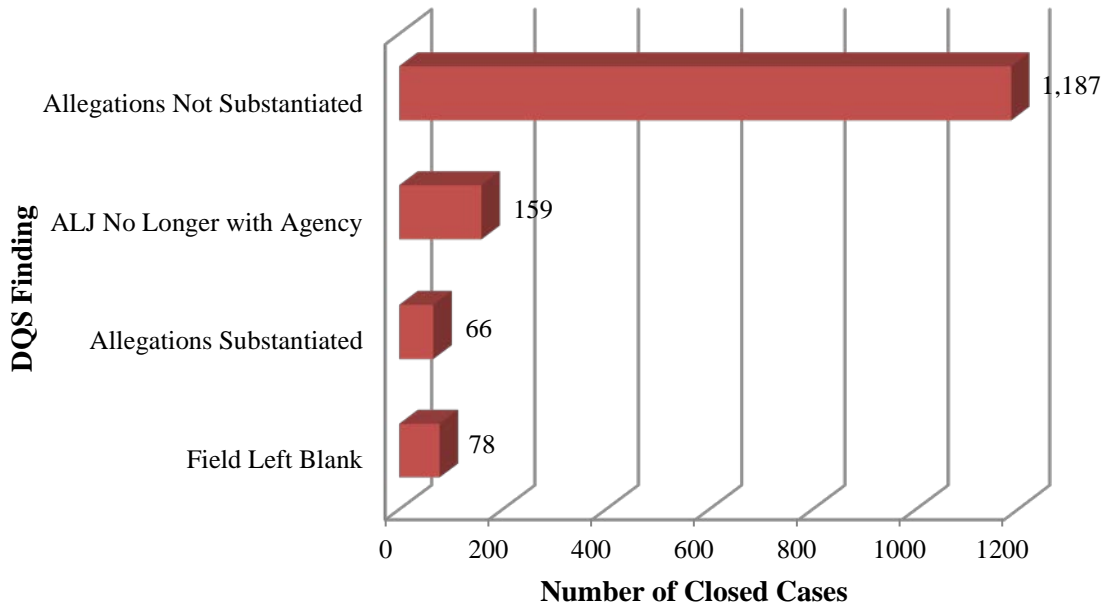
²³ ROs expressed interest in obtaining more information from DQS on the status of complaint processing. See Appendix D for their comments.

²⁴ Substantiating a complaint means DQS found the allegation had merit.

²⁵ Of the 43 ALJs, 34 had 1 complaint, 7 had 2 to 5 complaints, and the remaining 2 had 6 to 10 complaints.

²⁶ The ALJ/PAMC system also indicated that DQS is coordinating with SSA's Office of the General Counsel on one of the cases.

Figure 2: DQS Findings on 1,490 FY 2011 Closed Cases



SSA closed 159 (10.7 percent) of the 1,490 FY 2011 cases because 75 ALJs associated with these cases were no longer with the Agency.²⁷ The reasons for the ALJ departures varied. For example, we reviewed one case DQS closed because the ALJ had retired. The ALJ held a hearing with the claimant in August 2007, and on December 2010 (3 years later), DQS closed the complaint before fully investigating the allegation because the ALJ had retired. We reviewed another case where 22 closed complaints related to 1 ALJ were labeled as *ALJ No Longer With Agency* after the ALJ was removed from the Agency because of improper behavior.²⁸

Within ALJ/PAMC system, 78 (5.2 percent) of the 1,490 cases had no entry in the decision field. When we spoke to a DQS manager about the blank fields, she stated the fields were not required to close out an ALJ complaint case, though the ALJ/PAMC system was updated in 2012 to require this input. Blank decision fields reduce the value of any MI shared with internal or external parties.

DQS categorized each case using 11 complaint categories (see Table 2). Of the 66 substantiated complaints, about 68 percent related to “Unfair treatment/misconduct during the hearing,” followed by about 9 percent of the complaints pertaining to “Unfair treatment/misconduct in the written decision” (see Figure 3).

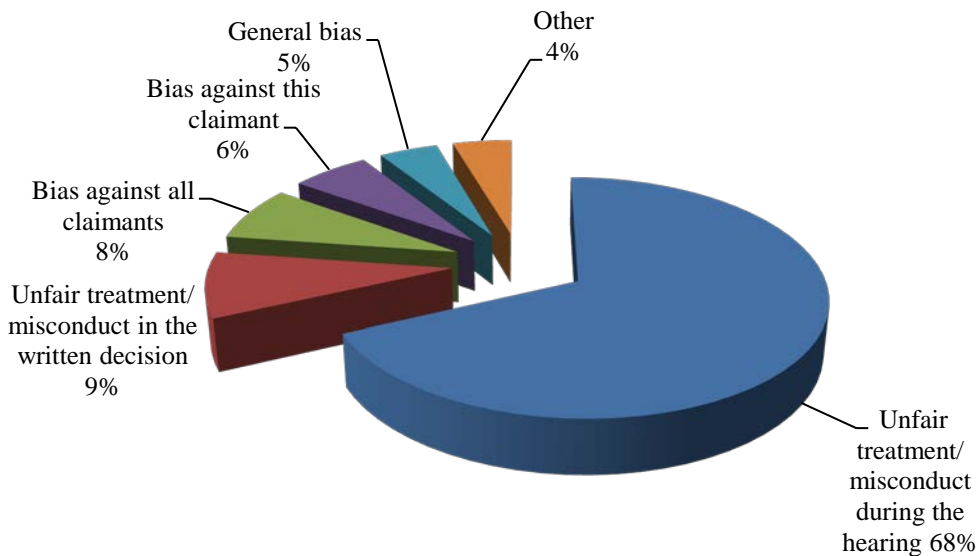
²⁷ Of the 75 ALJs, 48 had 1 complaint, 22 had 2 to 5 complaints, 4 had 6 to 10 complaints, and 1 ALJ had 22 complaints.

²⁸ See ALJ#3 in Appendix C.

²⁹ **Table 2: ALJ/PAMC System Basis for Complaint Codes**

Basis for Complaint	
1. Bias against all claimants	7. Religion
2. Bias against this claimant	8. Sexual orientation
3. Gender-related	9. Unfair treatment/misconduct during the hearing
4. General bias	10. Unfair treatment/misconduct in the written decision
5. No valid complaint stated	11. Other
6. Race/ethnicity/national origin	

Figure 3: Basis for Complaint Among 66 FY 2011 Closed Cases



System Information and Reports for Interested Parties

We reviewed the ALJ/PAMC system to determine whether DQS (1) designed the system to capture all key data associated with the complaint, (2) maintained support for data in the system, and (3) ensured the data represented a uniform timeframe. We also reviewed the availability and distribution of MI reports for interested parties.

²⁹ As we note later in the report, the ALJ/PAMC cannot categorize a case under more than one code.

Key ALJ Complaint Data Fields

We identified several areas where DQS could enhance the identifiers in the ALJ/PAMC system to improve the amount and quality of available management information. At the time of our review, the system was capturing key information, including

- information about the complainant and related parties,
- the ALJ associated with the complaint,
- the status of actions taken to investigate the complaint,
- the findings of the investigation, and
- the recommended action to resolve the complaint.

However, the ALJ/PAMC system was not capturing (1) the date the complainant first filed the complaint with the Agency (as well as the date of the event that generated the complaint, such as the hearing date); (2) the component that initially received the complaint; and (3) more than one “basis for complaint” if several issues were involved.

For example, we found complaint cases where more than one “basis for complaint” code was appropriate.³⁰ In our review of 45 sample cases, we found a case where the basis for complaint was listed generically as “bias against this claimant” in the ALJ/PAMC system, whereas in our review of the paper documents in the case folder, we determined DQS could have also coded this case as “gender-related.” DQS management said the database captures only one primary description of the complaint, though staff may add more descriptions about the case in the remarks field. However, we did not see any reference to a gender-related complaint in the remarks section associated with this case.

Part of the ALJ/PAMC system’s purpose is to assist with the management of complaints as well as identify patterns of improper behavior.³¹ Moreover, as noted earlier, a prior GAO report found SSA lacked useful mechanisms for detecting patterns of possible racial discrimination.³² The inclusion of more than one “basis for complaint” could assist in the detection of such patterns. In our discussions on this point, DQS management said they agreed that expanding the number of complaint bases would enhance the ability of the ALJ/PAMC system to identify problematic patterns.

³⁰ See Table 2 for a list of “basis for complaint” codes.

³¹ *Administrative Law Judge/Public Alleged Misconduct Complaints System*, 75 Fed. Reg. 8171 (February 23, 2010).

³² GAO, *supra* note 8.

SSA also maintains a separate process to track complaints related to civil rights issues such as race and gender under its Office of General Counsel (OGC). Under its recently updated policy,³³ SSA states, “Individuals who allege discrimination based on their race, color, national origin (including English language ability), religion, sex, sexual orientation, age, disability, or in retaliation for having previously filed a civil rights complaint, may also file a separate discrimination complaint with us using our civil rights complaint process.”³⁴ However, we did not find any mention of this OGC civil rights complaint process in SSA’s publication *How to File an Unfair Treatment Complaint Concerning an Administrative Law Judge*,³⁵ which states, “We do not treat you differently because of your race, sex, age or for disability, the amount of money you have, or for any other reason.” The publication goes on to describe the roles of the Appeals Council and DQS’ ALJ complaint process but is silent on the OGC process available to complainants. We believe the Agency’s acknowledgement of the OGC civil rights process on this same and/or similar publications would ensure the public was aware of all the options for filing a complaint against an ALJ and go further to ensure SSA management can detect patterns of improper behavior, including racial discrimination.³⁶

Support for ALJ Complaint Data

We selected a sample of 45 DQS cases to review related paper folders containing the complaint documentation to assess the completeness of the folders. We limited our review to 42 of the cases because DQS could not locate 3 sample case folders.³⁷ At the time of our review, 33 of the 42 cases were closed, and the remaining 9 cases were pending. After reviewing the folder documentation, we determined numerous key documents were missing.³⁸ For example, folders for 8 (42 percent) of 19 cases referred to the RO did not include an RO investigation report, and 10 (30 percent) of 33 case folders did not contain the DQS case summaries. As a result, we were

³³ SSA, SSR 13-1p: *Titles II and XVI: Agency Processes For Addressing Allegations of Unfairness, Prejudice, Partiality, Bias, Misconduct, or Discrimination by Administrative Law Judges (ALJs)*(Effective February 28, 2013); 78 Fed. Reg. 6168 (January 29, 2013); and *Corrections* 78 Fed. Reg. 9987 (February 12, 2013) and 78 Fed. Reg. 22361 (April 15, 2013).

³⁴ 78 Fed. Reg. 6168, 6169 (January 29, 2013). According to the SSR, an individual may file a discrimination complaint alleging discrimination by an ALJ by using Form SSA-437-BK (available at <http://www.socialsecurity.gov/online/ssa-437.pdf>). However, an individual is not required to use this form and may make a complaint with a letter that contains the same information. The discrimination complaint must be filed within 180 days of the alleged discriminatory action unless SSA finds there is good cause for late filing.

³⁵ SSA Publication No. 05-10071, March 2013. See Appendix E for a copy of the document.

³⁶ In our October 2008 report on customer service issues at the Dover hearing office, we also identified issues with SSA’s public information related to complaints against ALJs. See SSA OIG, *Customer Service Issues at the Dover Hearing Office* (A-12-08-28080), October 2008, p. 14.

³⁷ The three missing folders were the oldest among our sample cases. DQS closed these cases from 2004 and 2005 in late 2010.

³⁸ See Appendix F for the complete results.

unable to determine whether the information in the ALJ/PAMC system was consistent with underlying events and decisions.

In responding to our findings, DQS management stated all the relevant documents related to the complaint case were supposed to be in the paper complaint folder. However, DQS could not provide written procedures identifying the documents that needed to be maintained.³⁹ Although DQS has a business process to handle complaints, DQS would also benefit from written procedures and related controls that address document retention. Written policy is particularly important since DQS has experienced high staff turnover in the past.

Age of ALJ Complaint Data

We were unable to determine the completeness of the ALJ/PAMC system.⁴⁰ We learned that when DQS implemented the ALJ/PAMC system in March 2010 it did not establish consistent criteria on the age of the closed cases that would be entered into the system.

ODAR staff told us the system maintained pending ALJ complaints from October 2009 forward, so cases closed before October 2009 would likely not be in the ALJ/PAMC system. However, we reviewed system data and found closed ALJ complaint cases dated from as early as July 2004 in the ALJ/PAMC system. DQS managers told us they assigned each employee an ODAR region, and these employees determined the volume of closed complaints they would input to the system based on available time. Since the ALJ complaint cases in the ALJ/PAMC system lacked a uniform closed case cut-off, ALJs from one region may have a longer history of complaints in the ALJ/PAMC system than ALJs in other regions. A uniform starting point would have ensured greater consistency in the ALJ complaint data when tracking patterns of ALJ bias and misconduct.

MI for Internal and External Parties

At the time of our review, DQS was not generating MI reports for internal or external parties⁴¹ to track bias and misconduct patterns among the ALJ complaints. Moreover, as already noted,

³⁹ DQS staff stated the retention period for complaint documentation was 7 years after closing the case. However, when we contacted RO managers in all 10 ODAR regions, we learned the ROs retained the ALJ complaint documentation from 3 years to “indefinitely.” Any DQS guidelines on ALJ complaint documentation should also clarify the retention period.

⁴⁰ We discussed other completeness issues earlier in the report as well.

⁴¹ According to the Fed. Reg., outside parties include the Office of the President; a congressional office; the Department of Justice; the Equal Employment Opportunity Commission; the Federal Labor Relations Authority; the Office of Personnel Management; the General Services Administration; the National Archives and Records Administration; Federal, State, and local law enforcement; Federal, State, and local professional licensing boards; and officials of labor organizations. *Administrative Law Judge/Public Alleged Misconduct Complaints System*, 75 Fed. Reg. 8171, 8171 – 8173 (February 23, 2010).

missing and incomplete data fields have reduced the value of the ALJ/PAMC system to SSA managers and outside parties.

SSA established the ALJ/PAMC system in part to, “Provide [SSA] with information to...monitor and improve customer service...” as well as “Provide [SSA] with management information to document, monitor, and track complaints about ALJs, to identify patterns of improper ALJ behavior that may require further review and action, and to assist [SSA] in deterring recurring incidents of ALJ bias or misconduct.”⁴² The lack of MI and related monitoring, as well as the absence of key data within the ALJ/PAMC system, reduced ODAR’s ability to (1) identify patterns of improper ALJ behavior alleged by the public and (2) create policies and related training to deter recurring incidents. DQS will need to ensure data fields are available and properly completed, such as inputting DQS decisions on all closed cases and identifying all bases for complaints, before the ALJ/PAMC system will be a reliable tool for identifying misconduct patterns.

CONCLUSIONS

Using the available data, we determined the median time for ODAR to process an ALJ misconduct complaint in FY 2011 was about 894 days since the AC processed the majority of the cases before DQS could initiate its own review. DQS’ median processing time in FY 2011 was about 400 days, and DQS noted processing time improved in FY 2012. The ALJ/PAMC system lacked sufficient milestones and related data to track processing issues in ODAR. About 4.4 percent of the ALJ complaints was substantiated in FY 2011, though another 11 percent of the cases was never fully reviewed because the ALJ left the Agency before a review of the issue could be completed. About 5 percent of the decision fields were left blank in the system.

In terms of the ALJ/PAMC system, we determined it was not capturing key data on ALJ complaints that could assist Agency managers responsible for addressing ALJ complaints and improving customer service. In addition, we could not determine the reliability of the information in the ALJ/PAMC system because DQS lacked documentation to support system entries, staff did not uniformly input the initial data entry into the system, and staff left various key fields blank. Finally, at the time of our review, DQS was not sharing ALJ/PAMC system MI with internal or external parties, nor did the system contain milestones to track processing delays, though DQS was taking steps in both of these areas.

RECOMMENDATIONS

To enhance the use of the ALJ/PAMC system, including providing adequate management information to monitor trends and patterns, we recommend SSA:

⁴² *Id.* at p. 8171.

1. Create written procedures and related controls to ensure staff enter required data in the ALJ/PAMC system and maintain adequate support for the required periods.
2. Modify the ALJ/PAMC system to ensure all key information related to the complaint, including all bases for complaints, are captured in such a way to assist with management information reporting.
3. Ensure information on OGC's civil rights complaint process is shared with the public when discussing the ALJ public complaint options, which may include adding OGC civil rights language to the publication *How to File an Unfair Treatment Complaint Concerning an Administrative Law Judge*.
4. Create MI reports for components responsible for resolving ALJ complaints and preventing recurring problems, which may include ODAR, OGC, and ROs.
5. Review and resolve data quality issues identified in this report to enhance the quality of the ALJ/PAMC system.

AGENCY COMMENTS

SSA agreed with all of our recommendations. See Appendix G for the full text of SSA's comments.

APPENDICES

Appendix A — ADMINISTRATIVE LAW JUDGE COMPLAINT PROCESS FLOWCHART

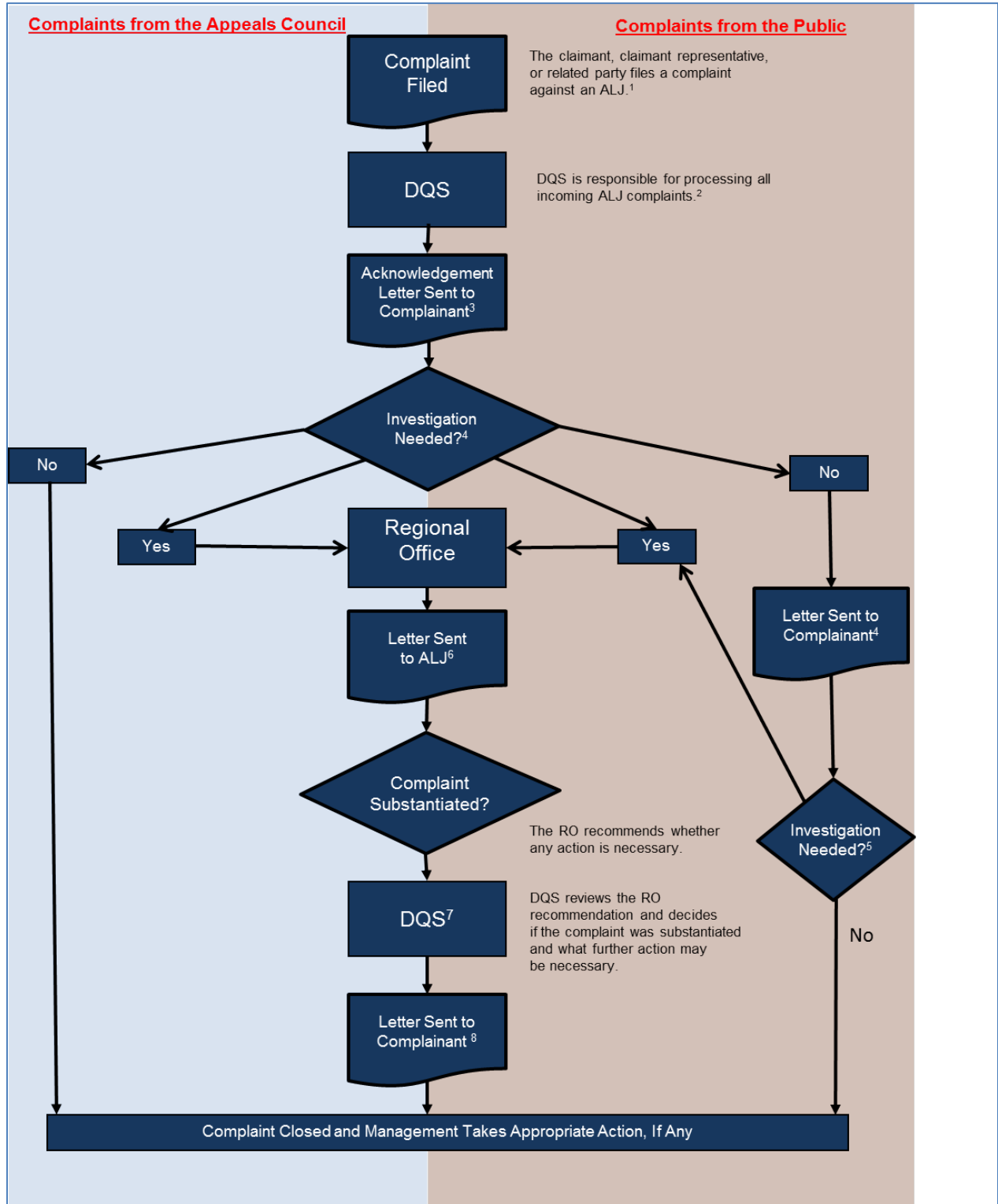


Figure Notes

1. Complaints can be filed with a number of parties, including the Appeals Council (AC), Office of the Inspector General (OIG), Regional Office (RO), Division of Quality Service (DQS), other Social Security Administration (SSA) components, and congressional offices on behalf of constituents.
2. The AC may identify ALJ conduct that it determines warrants referral to DQS even if a claimant has not alleged misconduct or filed a request for review with the AC.
3. DQS staff will also send an acknowledgment letter to the complainant if the complaint was received directly from the public. If the RO received the case directly from the public, the RO will send an acknowledgment letter to the complainant. No acknowledgment letter is sent for cases initially received by the AC since the AC will have already acknowledged receipt.
4. DQS staff will review the complaint and determine whether an RO investigation is necessary. If DQS staff determines the complaint does not require an RO investigation, DQS or RO notifies the ALJ of the complaint and the case is closed. If DQS staff determines the complaint requires further review, DQS sends a memorandum to the RO requesting an investigation of the complaint. The RO will notify the ALJ of the complaint and provide the ALJ an opportunity to respond. If the complaint came directly from the public and DQS staff determine the complaint is unclear, DQS sends a letter to the complainant providing him/her with the opportunity to submit specific allegations within 30 calendar days.
5. If DQS receives no additional information within 30 calendar days from the complainant, it closes the case. If DQS receives sufficient additional information within 30 calendar days, it makes a new determination on the new evidence.
6. For cases that require investigation, the RO notifies the ALJ associated with the complaint to provide him/her with an opportunity to comment on the complaint.
7. DQS reviews the recommendation and provides the RO with a closeout memorandum disclosing the final decision on the case.
8. DQS sends a close-out letter to the claimant or claimant representative if DQS received the case from the public. A letter is not required if the case originated with the AC. If the RO received the case from the public, it will send an acknowledgement and closing letter to the complainant.

Appendix B — SCOPE AND METHODOLOGY

To accomplish our objectives, we:

- Reviewed the applicable Federal laws and regulations, as well as the Social Security Administration's (SSA) policies and procedures, to gain an understanding of the Office of Disability Adjudication and Review's (ODAR) Administrative Law Judge/Public Alleged Misconduct Complaints (ALJ/PAMC) system and the ALJ complaint process.
- Reviewed the Division of Quality Service's (DQS) business process for handling ALJ bias/misconduct complaints.
- Interviewed ODAR staff and managers to discuss the ALJ/PAMC system and the ALJ complaint process.
- Interviewed the Office of Appellate Operations (OAO) staff and managers to discuss OAO's role in the ALJ/PAMC process.
- Obtained a file from DQS containing the 3,709 ALJ complaint cases maintained in the ALJ/PAMC system as of April 20, 2012. We selected 45 random sample transactions from the ALJ/PAMC system and attempted to locate the ALJ complaint paper folders associated with these cases to determine whether the information in the folders was accurately posted to the system. We provide our sample findings in Appendix F.
- Sent a questionnaire to managers in all 10 ODAR regions to gain an understanding of how they handled ALJ public complaints and what they thought about the complaint process and ALJ/PAMC system.
- Reviewed publicly available information related to the ALJ complaint process to assess the amount of information the Agency was sharing.

We found the ALJ/PAMC system data were not sufficiently reliable to meet our objective, which we explain in the body of the report. We conducted our audit at the Office of Audit in Chicago, Illinois, between March and December 2012. The principle entity audited was the Office of the Deputy Commissioner for Disability Adjudication and Review. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Appendix C — CASE CHARACTERISTICS OF THREE ADMINISTRATIVE LAW JUDGE COMPLAINT CASES

In our review of the number of complaints closed by the Division of Quality Service (DQS) in Fiscal Year (FY) 2011, we identified 13 administrative law judges (ALJ) with more than 10 closed complaints (see Table C-1). Below, we discuss the case characteristics of the 3 ALJs with 25 or more complaints.

Table C-1: ALJs with More Than 10 FY 2011 Closed Complaints

ALJ	SSA Region	Number of Complaints
ALJ 1	New York	33
ALJ 2	New York	28
ALJ 3	Atlanta	25
ALJ 4	New York	24
ALJ 5	New York	24
ALJ 6	New York	20
ALJ 7	San Francisco	19
ALJ 8	Philadelphia	14
ALJ 9	New York	13
ALJ 10	Seattle	12
ALJ 11	San Francisco	11
ALJ 12	San Francisco	11
ALJ 13	Philadelphia	11

Note: Some complaints closed in FY 2011 related to prior FYs.

ALJ 1 - Case Characteristics

This ALJ had 33 closed complaints in FY 2011. Per DQS, 29 of the allegations were unsubstantiated, though the ALJ/PAMC data noted such comments as, “ALJ used inappropriate remarks but did not rise to the level of bias.” The ALJ/PAMC did not record any results on the remaining four cases—the decision field was blank.¹ In comments associated with these four cases, the AC concluded that the ALJ’s behavior was inappropriate or biased against the clamant. While the 33 complaints related to FYs 2003 through 2006, DQS did not close these complaints until early FY 2011.²

ALJ 2 - Case Characteristics

This ALJ had 28 closed complaints in FY 2011. Per DQS, 27 of the allegations were unsubstantiated. The ALJ/PAMC system did not record a result for the remaining case.³ In comments associated with this case, the AC concluded that the ALJ “. . . made derogatory statements towards the claimant.” The 28 complaints were made between FYs 2000 and 2010, and DQS closed these complaints in FY 2011. At the time of our review, this ALJ was still working for the Agency.

ALJ 3 - Case Characteristics

This ALJ had 25 closed complaints in FY 2011. The ALJ/PAMC decisions on 22 cases were listed as *ALJ No Longer With Agency*. Of the remaining three complaints, one was unsubstantiated, one was blank,⁴ and one was substantiated, requiring that the ALJ be counseled. This ALJ was removed from the Agency because of (1) failure to follow instructions; (2) failure to follow a direct order to treat his coworkers and the public with courtesy; (3) conduct unbecoming an ALJ; and (4) failure to follow a direct order to conduct scheduled hearings. A DQS manager explained that DQS had to put complaints against this ALJ aside for approximately 2 years while the ALJ was on administrative leave. The manager added DQS was not allowed to contact the ALJ while he was away from the Agency.

¹ We spoke to DQS management about the blank fields and we were informed that these fields were not required to close out an ALJ complaint case, though the ALJ/PAMC system was updated in 2012 to require this input.

² DQS closed these complaints between November 30 and December 1, 2010.

³ See Footnote 1.

⁴ Id.

Appendix D—TIMELINESS OF COMPLAINT PROCESSING IN FISCAL YEAR 2011

We analyzed 1,490 cases closed by the Division of Quality Service (DQS) in Fiscal Year (FY) 2011¹ to determine the number of days the Office of Disability Adjudication and Review (ODAR), DQS, and regional offices (RO) needed to close cases.

Office of Disability Adjudication and Review Case Processing in FY 2011

We reviewed the amount of time it took the ODAR to process a case, from the date of the administrative law judge (ALJ) hearing to the date closed by DQS.² Using the data in the Administrative Law Judge/Public Alleged Misconduct Complaint (ALJ/PAMC) system, we calculated a median processing time of about 894 days.³ As shown in Figure D–1, of the cases closed in FY 2011, DQS closed about 30 percent more than 1,200 days after the hearing. The ALJ/PAMC system indicated that about 75 percent of the complaints was initially sent to the Appeals Council (AC).⁴ Cases originating with the AC tend to take longer to process because DQS does not receive the complaint until the AC determines that a complaint exists and forwards it to DQS for processing.

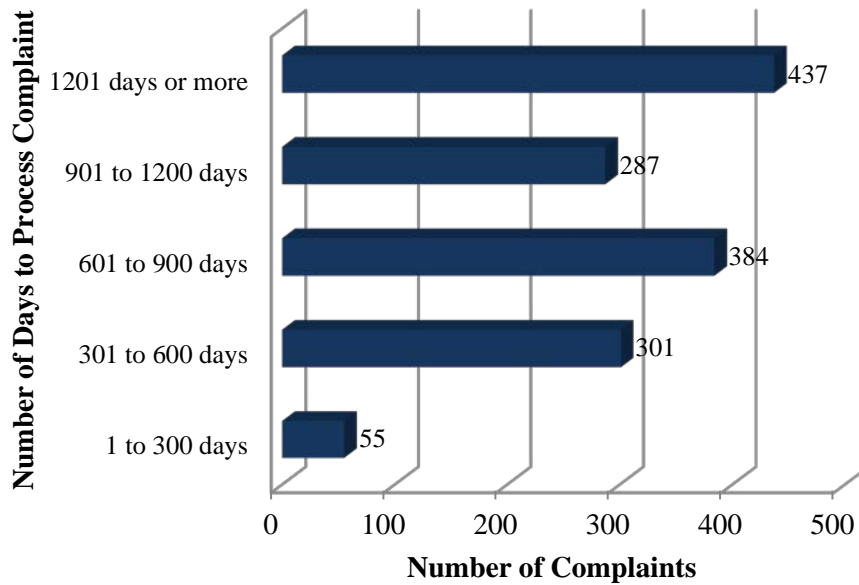
¹ This was the latest full FY in the ALJ/PAMC system at the time of our review.

² We used the date of initial hearing with the ALJ to determine the approximate date the complaint was filed since the ALJ/PAMC system did not always record the date SSA received the complaint. We noted this issue earlier in the report. Using the hearing date will add additional days to the processing time since the complaint would generally be filed after the hearing.

³ We excluded 26 closed cases that had no date of hearing.

⁴ It appeared that 1,108 of the 1,464 closed cases in FY 2011 were from the AC. However, we also noticed that 58 (16 percent) of the 356 cases marked “No” or blank in the “AC Referral” field contained other information indicating these cases started at the AC.

**Figure D-1: Number of Days for ODAR to Close a Case in FY 2011
(1,464 Closed Cases)**



Note: We calculated the number of days from the date of hearing to the date DQS closed the case.

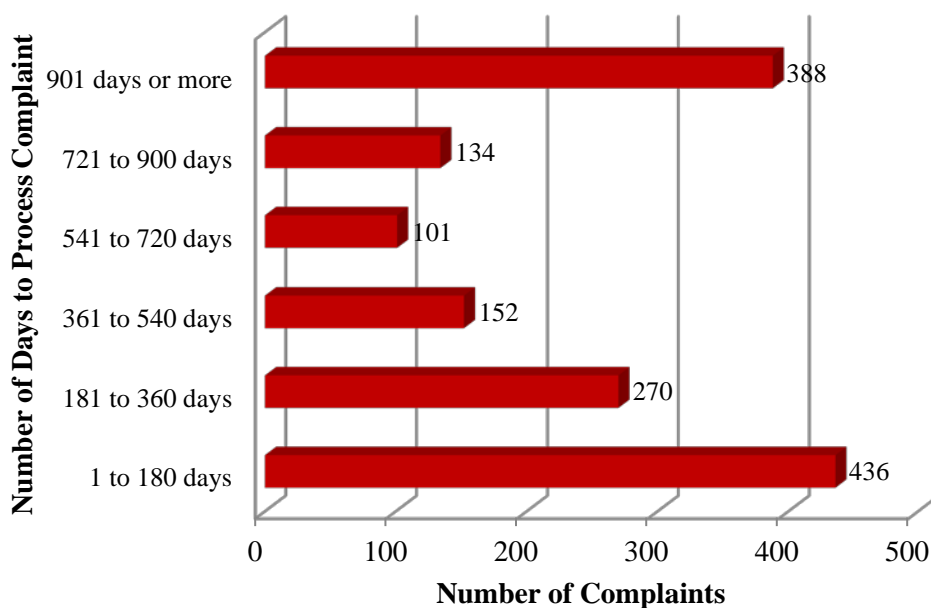
We reviewed one of the cases that took almost 1,000 days to process (from the hearing date) before it was closed. The hearing occurred in December 2008, and the claimant’s attorney filed a complaint in May 2009 with the AC about an “unfair hearing.” The RO was asked to investigate the issue in September 2010. RO staff did not find support for the allegation and recommended in November 2010 that DQS close the case as unsubstantiated. DQS agreed and closed the case 9 months later in August 2011. From the records we reviewed, it was not clear why it took DQS approximately 9 months to close this case.

DQS Case Processing in FY 2011

We reviewed how long it took DQS to process the 1,490 cases closed in FY 2011 and found the median time was approximately 400 days from the date DQS received the case to the date it closed the case.⁵ As shown in Figure D-2, approximately 35 percent of the cases took more than 720 days to process.

⁵ We excluded nine closed cases that showed DQS closed the case before it received the case.

**Figure D–2: Number of Days for DQS to Close a Case in FY 2011
(1,481 Closed Cases)**



Note: We calculated the number of days from the date DQS received the case to the date DQS closed the case.

RO Case Processing in FY 2011

Using ALJ/PAMC system data, we determined that 399 (27 percent) of the 1,490 cases closed in FY 2011 were sent to the RO for further investigation. Because of missing or erroneous RO return dates in the ALJ/PAMC system, we excluded 227 (57 percent) of the 399 cases when calculating the median time. Among the remaining cases, the median time for RO investigation of a complaint, from the date the RO received the case to the date the RO sent a recommendation to DQS, was about 201 days. The median range for all 10 ROs was between 55 and 461 days. However, our review of the RO dates in the ALJ/PAMC system determined that 7 of the 10 ROs' cases lacked RO return dates more than 50 percent of the time, limiting our ability to calculate a meaningful median processing time for these cases (see Table D–1).

**Table D-1: Available Dates Among FY 2011 ALJ/PAMC System
ALJ Complaint Cases from the Regional Offices
(399 FY 2011 Closed Cases)**

SSA Region	Number of Cases Sent for Investigation	Number of Cases with Both Dates	Percent of Cases with Sufficient Information to Calculate a Median Processing Time
Boston	13	8	61.5%
New York	19	9	47.4%
Philadelphia	63	35	55.6%
Atlanta	65	29	44.6%
Chicago	60	25	41.7%
Dallas	48	4	8.3%
Kansas City	16	4	25.0%
Denver	12	5	41.7%
San Francisco	91	53	58.2%
Seattle	12	0	0%
Totals	399	172	43%

We contacted staff at all of the ROs concerning the ALJ/PAMC system to learn more about RO processing of ALJ complaint cases. DQS told us the ROs lacked access to the ALJ/PAMC system, and all 10 ROs confirmed this lack of access, with 3 ROs stating they were not aware DQS had such a system. One RO stated it would like to have the ability to run reports on pending and closed cases. A second RO stated it would be helpful to receive monthly or quarterly reports of pending cases from DQS so they could compare records, whereas a third RO stated it was interested in learning more about the types of referrals to DQS and their disposition by hearing office. At the time of our review, ROs were not using the ALJ/PAMC system to check their workloads and identify missing or incorrect data elements.

When rating the ALJ complaint process, two ROs were dissatisfied, with one RO stating it would like to receive timely concurrence on complaints that have remained open long after the RO has completed its investigation and sent a recommendation to DQS.⁶ In our discussion with DQS managers, we learned DQS was planning to provide ROs with (1) processing timelines, (2) aged case reports, and (3) access to the ALJ/PAMC system. This access would be limited to data fields specific to each RO. It is possible that periodic reconciliations of ALJ/PAMC RO counts with the ROs, as well as RO access to its own information, could resolve some of the issues we identified.

⁶ The second RO stated that “many ‘complaints’ are not complaints at all. DQS’ overly simplistic criteria/system for picking these cases needs to be replaced with a more reasonable way of identifying actual complaints.”

Appendix E — HOW TO FILE AN UNFAIR TREATMENT COMPLAINT CONCERNING AN ADMINISTRATIVE LAW JUDGE

How To File An Unfair Treatment Complaint Concerning An Administrative Law Judge



The Social Security Administration wants to treat all claimants and their representatives fairly and equally. We do not treat you differently because of your race, sex, age or for disability, the amount of money you have, or for any other reason. Below we tell you more about what you should do if you think the Administrative Law Judge (ALJ) who conducted your hearing treated you unfairly.

What you should do if you think you were treated unfairly

If you think any ALJ treated you unfairly, you should tell us about it and ask us to look into it. You can ask even while we are deciding your claim for benefits.

You should give us your complaint in writing. But you also can tell us about your complaint, and we will write it down for you. Please give us as many details as you can, including:

- Your name, address and telephone number;
- Your Social Security number;
- Who treated you unfairly;
- How you think you were unfairly treated;
- When you think you were unfairly treated;
- The actions or words you thought were unfair;
- Who else saw or heard the unfair treatment; and
- If you are making the complaint for someone else, also give us your relationship to that person, and your name, address and telephone number.

What you need to know

Filing an unfair treatment complaint is not the same as appealing a decision. If you received a decision on your claim and you do not agree with it, you have 60 days from the date you receive the decision to ask for an appeal. The ALJ's decision letter will explain how to file an appeal. You can describe the unfair treatment in your appeal. For more information, ask for *The Appeals Process* (Publication No. 05-10041), which also is available online at www.socialsecurity.gov/pubs/10041.pdf.

www.socialsecurity.gov

Where to send your request

You can ask for help at any Social Security office to make your complaint. You also can write to:

Office of Disability Adjudication and Review
Division of Quality Service
5107 Leesburg Pike, Suites 1702/1703
Falls Church, VA 22041-3255

What Social Security will do

We will let you know that we received your complaint. Someone who has not been handling your claim before will look into the information you gave us in the complaint. You will be advised when the matter is closed.

If you also appealed the decision on your claim and included information about your complaint, the Appeals Council will address your complaint when responding to your appeal.

Contacting Social Security

For more information and to find copies of our publications, visit our website at www.socialsecurity.gov or call toll-free, 1-800-772-1213 (for the deaf or hard of hearing, call our TTY number, 1-800-325-0778). We treat all calls confidentially. We can answer specific questions from 7 a.m. to 7 p.m., Monday through Friday. Generally, you'll have a shorter wait time if you call during the week after Tuesday. We can provide information by automated phone service 24 hours a day.

We also want to make sure you receive accurate and courteous service. That is why we have a second Social Security representative monitor some telephone calls.



Social Security Administration
SSA Publication No. 05-10071
March 2013

Appendix F — REVIEW OF SAMPLE ADMINISTRATIVE LAW JUDGE COMPLAINTS

We reviewed the data recorded in a sample of Administrative Law Judge/Public Alleged Misconduct Complaints (ALJ/PAMC) system case folders maintained by the Division of Quality Service (DQS). We found that DQS maintained case folders for 42 of the 45 sample cases. DQS could not locate 3 of the 45 case folders. See Table F–1 for the results of our review of the 42 cases.

Table F–1: Results of Testing 42 Closed Sample Cases from the ALJ/PAMC System

33 Closed Sample Cases from the ALJ/PAMC			
Documents	Number of Cases Tested	Number of Forms Not Located	Percent Not Located
Copy of Original Complaint	33	3	9%
Acknowledgement Letter to the Complainant ¹	13	3	23%
ALJ Notification of the Complaint	33	24	73%
RO Investigation Report ²	19	8	42%
DQS Analysis/Summary ³	33	10	30%
ALJ Notification of DQS Decision	33	30	91%
DQS Closeout Letter to Regional Office (RO) ⁴	33	19	58%
Closeout Letter to the Complainant ^{1, 4}	13	3	23%
9 Open Sample Cases from the ALJ/PAMC ⁵			
Copy of Original Complaint	9	4	44%
Acknowledgement Letter to the Complainant ¹	6	5	83%
ALJ Notification of the Complaint	9	8	89%

Note 1: Only applies to complaints received directly from the public.

Note 2: We are providing results only on cases sent to the RO for investigation based on information available in the ALJ/PAMC database. The ALJ complaint receipt dates ranged from 2007 to early 2012.

Note 3: The ALJ complaint receipt dates ranged from 2007 to 2011.

Note 4: DQS noted that these close-out letters were added to the process in the last 2 years.

Note 5: For the nine open cases, we focused on those forms that should have been available at the start of the investigation. Everything but the three documents listed above were unavailable because these nine cases were still in process at the time of our review.

Appendix G – AGENCY COMMENTS



SOCIAL SECURITY

MEMORANDUM

Date: June 7, 2013

Refer To: SIJ-3

To: Patrick P. O'Carroll, Jr.
Inspector General

From: Katherine Thornton 
Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, "Administrative Law Judge Public Alleged Misconduct Complaints System" (A-05-11-01131)—INFORMATION

Thank you for the opportunity to review the draft report. Please see our attached comments.

Please let me know if we can be of further assistance. You may direct staff inquiries to Gary S. Hatcher at (410) 965-0680.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,
“ADMINISTRATIVE LAW JUDGE PUBLIC ALLEGED MISCONDUCT
COMPLAINTS SYSTEM” (A-05-11-01131)**

Recommendation 1

Create written procedures and related controls to ensure staff enter required data in the Administrative Law Judge/Public Alleged Misconduct Complaints (ALJ/PAMC) system and maintain adequate support for the required periods.

Response

We agree. We have taken steps to ensure we input all required data into the ALJ/PAMC system and maintain adequate support to keep the system accurate. We will include ALJ/PAMC system user responsibilities in a business process document. In addition, we are creating a checklist to include with each paper file so an employee can indicate which supporting documents are included in the file, along with space for relevant comments. Our goal is to finalize the written procedures and checklist by July 2013.

Recommendation 2

Modify the ALJ/PAMC system to ensure all key information related to the complaint, including all bases for complaints, are captured in such a way to assist with management information (MI) reporting.

Response

We agree. We are in the process of making modifications to the ALJ/PAMC system to ensure we report all key information. For example, we will expand a data field to capture all bases for a complaint, and we will include a data field to capture the source of the complaint.

Recommendation 3

Ensure information on the Office of the General Counsel’s (OGC) civil rights complaint process is shared with the public when discussing the ALJ public complaint options, which may include adding OGC civil rights language to the publication *How to File an Unfair Treatment Complaint Concerning an Administrative Law Judge*.

Response

We agree. We will revise the publication, *How to File an Unfair Treatment Complaint Concerning an Administrative Law Judge*, to include the civil rights discrimination complaint process.

Recommendation 4

Create MI reports for components responsible for resolving ALJ complaints and preventing recurring problems, which may include the Office of Disability Adjudication and Review (ODAR), OGC, and regional offices (RO).

Response

We agree. We are providing reports on aged cases to ODAR RO staff on a monthly basis. We also regularly review reports of ALJ complaint cases pending in all regions for workload management purposes. After we make modifications to the ALJ/PAMC system, we will provide our ODAR ROs access to the complaints pending in the respective regions.

Recommendation 5

Review and resolve data quality issues identified in this report to enhance the quality of the ALJ/PAMC system.

Response

We agree. We periodically review the ALJ/PAMC system to ensure its quality. Our Division of Quality Service (DQS) management review workload reports, at least monthly, to identify errors or inconsistencies in the system. DQS management also routinely meets with DQS staff to solicit suggestions for ways to improve the clarity of an entry, as well as the utility and function of the system. In January 2012, we modified the ALJ/PAMC system to make entries in certain fields mandatory before we close a complaint. With a more consistent staff and less turnover, DQS expects that data entries will be more accurate.

Appendix H– MAJOR CONTRIBUTORS

Walter Bayer, Director, Chicago Audit Division

Deborah Kinsey, Audit Manager, Chicago Audit Office

Lorrie Clement, Senior Auditor

Wai Ho Yung, Auditor-in-Charge

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Baltimore, Maryland 21235

FAX: 410-597-0118

Telephone: 1-800-269-0271 from 10:00 a.m. to 4:00 p.m. Eastern Standard Time

TTY: 1-866-501-2101 for the deaf or hard of hearing